

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

ERIC L. JEFFRIES,

Plaintiff,

VS.

CENTRE LIFE INSURANCE COMPANY,
et al.,

Defendants.

Case No. C-1-02-351

(Judge Beckwith)

(Magistrate Judge Hogan)

CENTRE LIFE'S MOTION TO
PLACE EXHIBIT 3 TO
PLAINTIFF'S EMERGENCY
MOTION TO COMPEL THE
PRODUCTION OF
OUTSTANDING DOCUMENTS
AND INFORMATION UNDER
SEAL

Plaintiff's Emergency Motion to Compel the production of outstanding documents and information attaches to it employment reviews of John Midghall, an employee of Defendant.

These reviews contain sensitive and confidential information. These documents are designated DMS0047-0053. Mr. Midghall is not an individual Defendant in this case and to electronically

file his employment reviews violates his expectation of privacy in those documents. Centre Life respectfully requests that the exhibit be stricken from the electronic record and placed under seal.

Respectfully submitted,

s/Peter M. Burrell

William R. Ellis (0012279)

Peter M. Burrell (0044139)

Amy Gasser Callow (0063470)

Wood & Lamping LLP

600 Vine Street, Suite 2500

Cincinnati, OH 45202-2491

(Telephone) (513) 852-6000

(Facsimile) (513) 852-6087

Attorneys for Defendants

Massachusetts Casualty Insurance Company
and Disability Management Services, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been filed with the Court by electronic means on this 19th day of March 2004. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

s/Peter M. Burrell
Peter M. Burrell, Esq.

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